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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

2009 DEC 15 P 3:39

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION
OF SOLARCITY FOR A
DETERMINATION THAT WHEN IT
PROVIDES SOLAR SERVICE TO
ARIZONA SCHOOLS, GOVERNMENTS,
AND NON-PROFIT ENTITIES IT IS NOT
ACTING AS A PUBLIC SERVICE
CORPORATION PURSUANT TO ART. 15,
SECTION 2 OF THE ARIZONA
CONSTITUTION

DOCKET NO. E-20690A-09-0346

Arizona Corporation Commission

DOCKETED

DEC 15 2009

DOCKETED BY *MW*

INITIAL POST-HEARING BRIEF
OF
ARIZONA PUBLIC SERVICE COMPANY

December 15, 2009

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1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 COMMISSIONERS

3 KRISTIN K. MAYES, Chairman
4 GARY PIERCE
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14 PUBLIC SERVICE CORPORATION
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16 THE ARIZONA CONSTITUTION

DOCKET NO. E-20690A-09-0346

**INITIAL POST-HEARING BRIEF
OF ARIZONA PUBLIC SERVICE
COMPANY**

14 **I. INTRODUCTION**

15 On July 2, 2009, SolarCity Corporation (“SolarCity”) filed a request that the Arizona
16 Corporation Commission (“Commission”) determine that SolarCity was not a public service
17 corporation when it provided solar services pursuant to a Solar Service Agreement (“SSA”) to
18 schools, governmental organizations, and non-profit entities. As a part of its application,
19 SolarCity provided two SSAs that had been entered into with the Scottsdale Unified School
20 District to illustrate the terms and conditions of such a transaction.

21 The substantive question before the Commission pertains to solar energy service
22 companies that provide services pursuant to SSAs, where the solar developer capitalizes,
23 installs, owns, and operates a solar system, and receives a payment for the services provided
24 based upon the energy produced by the system. Pursuant to the Arizona Constitution, an
25 entity that furnishes electricity for light or power is a public service corporation, subject to
26 Commission jurisdiction.¹ Although the SolarCity SSAs specify that from the moment it is

27
28 ¹ ARIZ. CONST. Art. 15, §§ 2-3.

1 created, the electricity is the sole legal possession of the customer, because the payments
2 under the SSAs are on a kilowatt-hour basis, the issue of whether SSA providers should be
3 regulated has been raised. The ultimate question is whether the manner in which SSA
4 transactions are structured is a sufficient basis to require Commission regulation. Because the
5 constitutional issue of whether an individual SSA provider is a public service corporation
6 necessarily depends on the individual case and specific facts, to assure a clear resolution of
7 issues, an evidentiary hearing was held to establish a record upon which the Commission
8 could make its determination.

9 This is a case of first impression, with significant policy implications, and it is for
10 these reasons that Arizona Public Service Company (“APS” or “Company”) has intervened in
11 this matter. In this docket, the facts presented involve the installation of a facility on an
12 individual customer’s premises and the provision of solar energy solely to that customer. For
13 the reasons discussed below, APS is taking no position regarding whether the solar provider
14 in such a transaction should be deemed a public service corporation. However, should that
15 business model be expanded so that a solar provider supplied electricity to multiple customers
16 from a single facility, such as a master-planned community with a solar substation or a
17 shopping center with a solar facility that sold electricity to multiple commercial tenants, APS
18 believes that such a provider would likely be a public service corporation. Therefore, in this
19 docket, should the Commission determine that SolarCity is not a public service corporation,
20 APS urges the Commission to find specifically that such a determination would only apply to
21 a business model that involves a solar installation serving a single customer.

22 **II. “ONE CUSTOMER, ONE ROOFTOP” BUSINESS MODEL**

23 The Commission has set forth a clear public policy mandate with the adoption of the
24 Renewable Energy Standard (“RES”) Rules,² finding that renewable energy is in the public
25 interest. The adoption of the most comprehensive distributed energy requirement in the
26 country clearly indicates that renewable facilities located at a customer’s premise was a
27

28 ² A.A.C. R14-2-1801 through 1816.

1 fundamental component of the Commission's vision.³ The SSAs provided in this docket
2 would facilitate the increased use of distributed energy, which in turn would provide an
3 additional means for jurisdictional electric utilities to meet the distributed renewable energy
4 requirements of the RES Rules.

5 APS recognizes that solar service providers, such as SolarCity, provide customers with
6 options that allow for the broader deployment of renewable technologies, and considers solar
7 providers as partners in providing solar energy alternatives for customers.⁴ The Company has
8 observed that customers have a growing interest in a distributed energy model where a third
9 party installs, owns, and operates renewable systems. Based on the requests made for
10 incentives pursuant to APS's distributed energy programs, there are indications that many
11 non-residential customers intend to use a solar service agreement (or something equivalent)
12 when installing solar systems.⁵ APS supports arrangements, including SSAs, that provide
13 customers choice and flexibility in their acquisition of solar energy.

14 APS believes that similar to an individual's right to drill a well on one's property,
15 electric customers have a right to install renewable energy facilities on their premises to offset
16 the amount of energy they need to procure from their electric company.⁶ Because the
17 business model under inquiry in this docket is a transaction that involves an individual
18 customer with a solar facility serving only that customer's premise (referred to as "one
19 customer, one rooftop"), the Company is taking no position on whether SolarCity is a public
20 service corporation.⁷ APS would not object if the Commission concluded that such a
21 business model does not result in "public service corporation" status.

24 ³ The RES Rules require the increased use of energy from renewable resources; the requirement grows from
25 two percent in 2009 to fifteen percent by 2025. A.A.C. R14-2-1804(B). The requirement for distributed
26 energy escalates more quickly than the overall requirement. By 2012, thirty percent of a utility's Annual
Renewable Energy Requirement must be comprised of distributed energy applications. A.A.C. R14-2-1805.

27 ⁴ See B. Lockwood testimony at Hearing Transcript, vol. III, 644, 680 (October 16, 2009).

27 ⁵ *Id.* at 640-41.

28 ⁶ See B. Lockwood Direct Testimony at 4:4-7 (Sept. 30, 2009).

28 ⁷ See B. Lockwood testimony H'rg Tr., vol. III, 641.

1 **III. CONCERNS REGARDING AN EXPANDED BUSINESS MODEL**

2 While the particular business model proposed by SolarCity in this docket was the “one
3 customer, one rooftop” model, during the course of the evidentiary hearing one solar provider
4 indicated that a business model involving a solar installation serving multiple customers
5 (multiple meters) could be contemplated by SSA providers.⁸ Additionally, it was generally
6 agreed in the hearing that because the solar industry is an emerging industry, it is likely that
7 there will be any number of changes in the future.⁹ Because a determination on the
8 constitutional question of whether an entity is a public service corporation depends on the
9 facts in an individual case, it is important that the Commission narrowly fashion its finding in
10 this docket, to ensure that the Commission has the ability to address changing circumstances
11 in the future, if necessary.

12 A change in a business model where SolarCity or any other solar service provider were
13 to expand its business model to provide electricity to multiple customers (multiple meters)
14 from a single facility would require further Commission scrutiny. For the reasons discussed
15 below, APS believes that under those circumstances, the solar provider could be furnishing
16 electricity and dedicating its facilities to the public use, making it likely that it would be a
17 public service corporation, subject to Commission regulation.¹⁰

18 A solar provider that owned the generating facility and supplied solar energy to
19 multiple customers, depending on the specific facts and circumstances, may well satisfy the
20 literal and textual definition of a public service corporation under the Arizona Constitution,
21 which defines a public service corporation as “[a]ll corporations . . . engaged in furnishing . . .
22 electricity for fuel, light or power.”¹¹ The Arizona courts have construed the constitutional
23

24 _____
25 ⁸ See H.M. Irvin, III of SunPower Corporation testimony at Hr’g Tr. vol. II, 408 (October 15, 2009).
26 ⁹ See Hr’g Tr. vol. 1, 79 (October 14, 2009) (this is an extremely important jurisdictional proceeding as it
27 relates to the nascent solar industry in Arizona); Hr’g Tr. vol. III, 763 (SolarCity’s rate base could change
28 dramatically in a short period of time, given additional solar installations and the changing technology); see
also Hr’g Tr. vol. V, 1112-1113 (November 2, 2009) (there are a number of possible future scenarios in
regards to the relationship between incumbent utilities and SSA providers); see also Hr’g Tr., vol. V, 1116.
¹⁰ See B. Lockwood Dr. Test. 4:11-17.
¹¹ ARIZ. CONST. Art. 15, § 2.

1 definition of “furnishing.”¹² The Arizona Supreme Court interpreted the constitutional term
2 “furnish” to mean “to provide or supply with what is needed, useful or desirable,” and the
3 Court concluded that the word “furnish” connoted a transfer of possession.¹³

4 During the hearing, hypotheticals were used to illustrate the variety of circumstances
5 where there could be “one-installation, multiple-customer” arrangements.¹⁴ For example, if a
6 trailer park was supplied solar energy measured through a single master meter for the entire
7 park, and each tenant’s electricity cost was included in the individual rent for the space, the
8 hypothetical would be consistent with the totalizing of meters pursuant to APS’s Schedule
9 4,¹⁵ and APS would not have an issue with that arrangement.¹⁶ This was contrasted with a
10 hypothetical where solar energy from a single facility was provided to a trailer park where
11 each trailer home has an individual meter. From APS’s perspective, the latter situation
12 appears to be furnishing electricity as a public service corporation to multiple customers.¹⁷

13 In addition to the constitutional analysis, under Arizona case law there are a number of
14 other factors to be considered. The salient factor in determining whether a solar provider who
15 supplied solar energy to multiple customers is a public service corporation is if the provider
16 has dedicated property to public use (the “Public Use Factor”), which was articulated in the
17 *Serv-Yu Coop* case,¹⁸ and followed by other courts.¹⁹ The courts acknowledge that there is
18 not a presumption that all use of service in connection with a commodity in which the public
19 has an interest is a dedication to public use. The general rule that courts follow in construing

20
21 ¹² See *Natural Gas Service Co. v. Serv-Yu Coop.*, 70 Ariz. 235, 219 P.2d 324 (1950); *Southwest Transmission*
Coop., Inc. v. Ariz. Corp. Comm’n, 213 Ariz. 427, 430, 142 P.3d 1240, 1243 (App. 2006).

22 ¹³ *Williams v. Pipeline Trades Industry Program of Arizona*, 100 Ariz. 14, 20, 409 P.2d 720, 724 (1966).

23 ¹⁴ See B. Lockwood testimony, Hr’g Tr. vol. III, 653.

24 ¹⁵ APS believes that the definitions and requirements for a “customer site,” pursuant to APS’s Service
Schedule 4, which details the requirements for a customer to use totalized metering of multiple service
entrance sections at a single site, is the appropriate mechanism for determining the “one customer, one
rooftop” distinction. See Lockwood Dr. Test. at 5:11-6:10.

25 ¹⁶ See B. Lockwood testimony, Hr’g Tr. vol. III, 653.

26 ¹⁷ *Id.*

27 ¹⁸ *Natural Gas Service Co. v. Serv-Yu Coop.*, 70 Ariz. 235, 219 P.2d 324 (1950).

28 ¹⁹ See *Southwest Transmission Coop., Inc. v. Ariz. Corp. Comm’n*, 213 Ariz. 427, 142 P.3d 1240, (App. 2006);
Southwest Gas Corp. v. Ariz. Corp. Comm’n, 169 Ariz. 279, 818 P.2d 714 (App. 1991); *General Alarm, Inc. v.*
Underdown, 76 Ariz. 235, 262 P.2d 671 (1953); *Ariz. Corp. Comm’n v. Nicholson*, 108 Ariz. 317, 497 P.2d
815 (1972); *Ariz. Water Co. v. Ariz. Corp. Comm’n*, 161 Ariz. 389, 778 P.2d 1285 (App. 1989).

1 the Public Use Factor is to assess the entity's intent shown by the circumstances of the
2 individual case.²⁰ The fact that a solar provider who provides electricity to multiple
3 customers located at other sites would likely involve the use of public infrastructure, would
4 also likely weigh in a finding of dedication to the public use.

5 These examples emphasize the need in the present case for the Commission's
6 determination to be narrowly drawn, leaving the ability for the Commission to make
7 determinations regarding expanded business models in the future.

8 IV. EXPANDING THE SCOPE OF COMMISSION'S DETERMINATION

9 During the evidentiary hearing, there were questions raised from the bench,²¹ from the
10 Commission,²² and from the public²³ about whether the SolarCity adjudication could legally
11 be expanded to include solar providers who enter into SSAs with private third parties (other
12 than schools, governmental and nonprofit institutions). From a business perspective, APS
13 would prefer that the outcome in this docket resolve the issue of regulation for all SSA
14 providers.²⁴ From a legal perspective, APS believes that such an expansion may depend on
15 the Commission's final decision in this matter, based upon the consequence of that decision.

16 There are basic due process requirements that apply to the Commission. When the
17 Commission exercises a judicial or quasi-judicial function, due process of law requires that a
18 hearing be held before it issues a decision.²⁵ An adjudicatory order requires adherence to the
19 principles of due process embodied in the federal and state constitutions and codified in the
20 contested case provisions of the Arizona Administrative Procedure Act.²⁶ Arizona courts

23 ²⁰ See *Ariz. Corp. Comm'n v. Nicholson*, 108 Ariz. 317, 320, 497 P.2d 815, 818 (1972); *Southwest
Transmission Coop., Inc.*, 213 Ariz. 427, 432, 142 P.3d 1240, 1246 (App. 2006).

24 ²¹ See Administrative Law Judge Rodda, Hr'g Tr. vol. I, 61, 70, 97-98.

25 ²² See Chairman Mayes, Hr'g Tr. vol. I, 38.

26 ²³ See comments of Solar Alliance, Hr'g Tr. vol. I, 38; see also Arizona Solar Energy Industries Association
letter dated October 13, 2009, which asked the Commission to "expand the scope of the decision before it in
the SolarCity application beyond schools, non-profit organizations and governmental entities to include all
potential SSA customers that are in a position to benefit from this proven financing mechanism."

27 ²⁴ See B. Lockwood testimony, Hr'g Tr. vol. III, 665-66.

28 ²⁵ See *Ariz. Public Service Co. v. Ariz. Corp. Comm'n*, 155 Ariz. 263, 270, 746 P.2d 4, 11 (1987).

²⁶ *Id.*

1 have not hesitated to require notice and a hearing when the Commission has issued an order
2 affecting a corporation's property or liberty interests.²⁷

3 APS believes that there are two potential outcomes in this case: one that would
4 significantly affect SSA providers' business in the near-term, and one that would not.
5 Therefore, if the Commission were to find that a solar provider who executed an SSA with
6 schools, government agencies or non-profits did not require Commission regulation as a
7 public service corporation, it is likely that that such a finding could be expanded to include all
8 SSA providers, because such a determination would likely not impact any protected rights of
9 those SSA providers who were not represented in this docket.

10 On the other hand, if the Commission were to issue an adjudicatory order that
11 concluded that all SSA providers were public service corporations subject to the
12 Commission's regulatory jurisdiction, there may be an issue whether those SSA providers
13 who did not have an opportunity to participate in this docket were afforded procedural due
14 process. The question will be whether those SSA providers have a protected interest that
15 would afford them the right to notice and a hearing. Relevant to these considerations is the
16 fact that the public notice in this docket stated that:

17 On July 2, 2009, SolarCity Corporation ... filed with the Arizona Corporation
18 Commission ...an application for a determination that when it provides solar service to
19 Arizona schools, government, and non-profit entities under Solar Service Agreements
20 ... it is not acting as a public service corporation pursuant to Article 15, Section 2 of
the Arizona Constitution ...” [Emphasis added].²⁸

21 In assessing whether the non-participant SSA providers have a protected interest, one
22 must consider that generally SSA providers have a right to engage in free enterprise and
23 competition in the market place.²⁹ Interference with this right may trigger due process

24
25 ²⁷ See *Ariz. Public Service Co. v. Ariz. Corp. Comm'n*, 155 Ariz. 263, 271, 746 P.2d 4, 12 (App. 1987), citing
26 *Ariz. Corp. Comm'n v. Palm Springs Utility Co., Inc.*, 24 Ariz. 124, 126, 536 P.2d 245, 247 (App. 1975) (order
27 requiring a water company to furnish water of a specified quality); *S. Pac. Co. v. Ariz. Corp. Comm'n*, 98 Ariz.
339, 347-348, 404 P.2d 692, 697-698 (1965) (order requiring a railroad to restore specified train service); and
S. Pac. Co. v. Ariz. Corp. Comm'n., 84 Ariz. 365, 329 P.2d 883 (1958), *appeal dismissed*, 359 U.S. 532, 79 S.
Ct. 1136 (1959) (order requiring the railroad to install warning signals at a particular crossing).

28 ²⁸ See Procedural Order, pgs. 7-8 (July 22, 2009).

29 ²⁹ See *General Alarm v. Underdown*, 76 Ariz. 235, 238, 262 P.2d 671, 672-73 (1953).

1 requirements because there is a presumption that a business activity is not within the
2 regulation of the Commission.³⁰ These factors must be taken into consideration to ensure that
3 any final Commission decision receives proper deference from the courts.

4 **V. RESPONSE TO COMMISSIONER NEWMAN'S LETTER**

5 In a November 18, 2009 letter, Commissioner Newman posed questions to the parties
6 in this docket regarding contractual provisions related to the ownership of the solar facilities
7 installed by SolarCity. The following is APS's response to those issues.

8 APS agrees with Commissioner Newman that under the terms of the SSAs provided in
9 this docket, the schools have the option to acquire ownership of the solar facilities. This was
10 confirmed by Mr. Rive, SolarCity's Chief Executive Officer, in his testimony at the hearing.³¹
11 APS does not have knowledge to address the questions regarding whether certain changes to
12 the option of ownership would achieve the economic results desired by SolarCity.

13 Commissioner Newman also asked questions related to the hypothetical where the
14 ownership option became mandatory at the end of the contract. APS believes that such a
15 provision would be a factor in the *Serv-Yu* analysis, and may weigh towards viewing the SSA
16 as a financing alternative. However, no ultimate conclusion could be made without
17 consideration of the constitutional analysis and the other factors cited by the courts.³²

18 **VI. CONCLUSION**

19 In conclusion, APS urges the Commission, in making its determination whether
20 SolarCity is a public service corporation subject to the Commission's jurisdiction, to narrowly
21 draw its determination to the facts presented by the SSAs in this docket, that is, a business
22 model of an individual customer serving only that customer's premises.

23 ///

24 ///

25 _____
26 ³⁰ See *Ariz. Corp. Comm'n v. Cont'l Security Guards*, 5 Ariz. App. 318, 321, 426 P.2d 418, 421 (1967).

27 ³¹ See L. Rive testimony, Hr'g Tr. vol. I, 106, 168; Hr'g Tr. vol. II, 265-66.

28 ³² The Arizona courts have noted that the *Serv-Yu* factors serve as guides for this analysis. *Southwest Gas Corp. v. Ariz. Corp. Comm'n*, 169 Ariz. 279, 287, 818 P.2d 714, 722, citing *Petrolane-Arizona Gas Serv. v. Ariz. Corp. Comm'n*, 119 Ariz. at 259, 580 P.2d at 720.

1 RESPECTFULLY SUBMITTED this 15th day of December, 2009.

2 PINNACLE WEST CAPITAL CORPORATION
3 LAW DEPARTMENT

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5 By: 
6 Deborah R. Scott
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Litchfield Park, AZ 85340

Champie Elementary District
HCR 1 Castle Hot Springs
Morristown, AZ 85342

Morristown Elementary District
P.O. Box 98
Morristown, AZ 85342

Palo Verde Elementary District
P.O. Box 108
Palo Verde, AZ 85383

Parker Unified School District
P.O. Box 1090
Parker, AZ 85344

Mohawk Valley Elementary District
5151 S. Ave 39E
Roll, AZ 85347

Salome Consolidated Elementary District
P.O. Box 339
Salome, AZ 85348

Gadsden Elementary District
P.O. Box 6870
San Luis, AZ 85349

Somerton Elementary District
P.O. Box 3200
Somerton, AZ 85350

Union Elementary District
3834 S. 91st Ave
Tolleson, AZ 85353

Tolleson Elementary District
9261 W. Van Buren
Tolleson, AZ 85353

Tolleson Union High School District
9801 W. Van Buren Street
Tolleson, AZ 85353

Saddle Mountain Unified School District
38201 W. Indian School Road
Tonopah, AZ 85354

Antelope Union High School District
9168 Ave 36 E
Wellton, AZ 85356

Wellton Elementary District
P.O. Box 517
Wellton, AZ 85356

Wenden Elementary District
P.O. Box 8
Wenden, AZ 85357

Owens-Whitney Elementary District
P.O. Box 38
Wikieup, AZ 85360

Nadaburg Unified School District
32919 Center St
Wittmann, AZ 85361

Yarnell Elementary District
P.O. Box 575
Yarnell, AZ 85362

Yuma Elementary District
450 West 6th Street
Yuma, AZ 85364

Crane Elementary District
4250 W. 16th Street
Yuma, AZ 85364

Dysart Unified District
15802 N. Parkview Place
Surprise, AZ 85374

Peoria Unified School District
P.O. Box 39
Peoria, AZ 85380

Wickenburg Unified District
40 West Yavapai St
Wickenburg, AZ 85390

Globe Unified District
455 N. Willow
Globe, AZ 85501

Eagle Elementary District
P.O. Box 1566
Clifton, AZ 85533

Clifton Unified District
P.O. Box 1567
Clifton, AZ 85533

Duncan Unified District
P.O. Box 710
Duncan, AZ 85534

Ft Thomas Unified District
P.O. Box 300
Fort Thomas, AZ 85536

Miami Unified District
P.O. Drawer H
Miami, AZ 85539

Morenci Unified District
P.O. Box 1060
Morenci, AZ 85540

Payson Unified District
P.O. Box 919
Payson, AZ 85541

Pima Unified District
P.O. Box 429
Pima, AZ 85543

Pine Strawberry Elementary District
P.O. Box 1150
Pine, AZ 85544

Safford Unified District
734 11th Street
Safford, AZ 85546

Klondyke Elementary District
921 Thatcher Blvd
Safford, AZ 85546

San Carlos Unified District
P.O. Box 207
San Carlos, AZ 85550

Solomon Elementary District
P.O. Box 167
Solomon, AZ 85551

Thatcher Unified District
P.O. Box 610
Thatcher, AZ 85552

Tonto Bason Elementary District
P.O. Box 337
Tonto Basin, AZ 85553

Young Elementary District
P.O. Box 3890
Young, AZ 85554

Benson Unified School District
360 S. Patagonia St
Benson, AZ 85602

Bisbee Unified District
100 Old Douglas Rd
Bisbee, AZ 85603

Bowie Unified District
P.O. Box 157
Bowie, AZ 85605

Cochise Elementary District
P.O. Box 1088
Cochise, AZ 85606

Douglas Unified District
1132 12th Street
Douglas, AZ 85607

Valley Union High School District
P.O. Box 158
Elfrida, AZ 85610

Elfrida Elementary District
P.O. Box 328
Elfrida, AZ 85610

Rucker Elementary District
P.O. Box 618
Elfrida, AZ 85610

Sonoita Elementary District
HC 1 Box 36
Elgin, AZ 85611

Palominas Elementary District
P.O. Box 38
Hereford, AZ 85615

Forrest Elementary District
P.O. Box 208
Bisbee, AZ 0

McNeal Elementary District
P.O. Box 8
McNeal, AZ 85617

Double Adobe Elementary District
7081 N. Central Hwy.
McNeal, AZ 85617

Naco Elementary District
P.O. Box 397
Naco, AZ 85620

Santa Cruz Elementary District
HC2 Box 50
Nogales, AZ 85621

Nogales Unified District
310 W. Plum St
Nogales, AZ 85621

Continental Elementary District
P.O. Box 547
Green Valley, AZ 85622

Oracle Elementary District
725 N. Carpenter Drive
Oracle, AZ 85623

Patagonia Union High School District
P.O. Box 254
Patagonia, AZ 85624

Patagonia Elementary District
P.O. Box 254
Patagonia, AZ 85624

Ash Creek Elementary District
6460 E. Hwy 181
Pearce, AZ 85625

Pearce Elementary District
1487 E. School Rd
Pearce, AZ 85625

Pomerene Elementary District
P.O. Box 7
Pomerene, AZ 85627

Sahuarita Unified District
350 W. Sahuarita Rd
Sahuarita, AZ 85629

St. David Unified District
P.O. Box 70
St David, AZ 85630

Mammoth-San Manuel Unified District
P.O. Box 406
San Manuel, AZ 85631

San Simon Unified District
P.O. Box 38
San Simon, AZ 85632

San Fernando Elementary District
P.O. Box 80
Sasabe, AZ 85633

Indian Oasis-Baboquivari Unified District
P.O. Box 248
Sells, AZ 85634

Sierra Vista Unified District
3555 Fry Blvd
Sierra Vista, AZ 85635

Empire Elementary District
HC1 Box 1100
Sonoita, AZ 85637

Tombstone Unified District
P.O. Box 1000
Tombstone, AZ 85638

Vail Unified District
P.O. Box 800
Vail, AZ 85641

Bonita Elementary District
18008 S. Ft Grand Rd
Bonita, AZ 85643

Wilcox Unified District
480 N. Bisbee
Wilcox, AZ 85643

Lawrence Robertson, Jr
P.O. Box 1448
Tubac, AZ 85646

Santa Cruz Valley Unified District
1374 W. Frontage Rd
Rio Rico, AZ 85641

Marana Unified District
11279 W. Grier Rd., Suite 115A
Marana, AZ 85653

Redington Elementary District
130 W. Congress St., 4th Floor
Tucson, AZ 85701

Philip Dion
Unisource Energy Corporation
One South Church Ave, Suite 200
Tucson, AZ 85701

Amphitheater Unified District
701 W. Wetmore
Tucson, AZ 85705

Flowing Wells Unified District
1556 W. Prince Rd
Tucson, AZ 85705

Sunnyside Unified District
2238 E. Ginter Rd
Tucson, AZ 85706

Russell Jones
5210 E. Williams Circle Suite 800
Tucson, AZ 85711

Catalina Foothills Unified District
2101 E. River Rd
Tucson, AZ 85718

Tucson Unified District
1010 E. 10th Street
Tucson, AZ 85719

Tanque Verde Unified District
11150 E. Tanque Verde Rd
Tucson, AZ 85749

Show Low Unified District
500 W. Old Linden Rd
Show Low, AZ 85901

Concho Elementary District
P.O. Box 200
Concho, AZ 85924

Heber-Over Unified District
P.O. Box 547
Heber, AZ 85928

Blue Ridge Unified District
1200 W. White Mountain Blvd
Lakeside, AZ 85929

McNary Elementary District
P.O. Box 598
McNary, AZ 85930

Chevelon Butte School District
P.O. Box 1574
Forest Lakes, AZ 85931

St Johns Unified District
P.O. Box 3030
St Johns, AZ 85936

Snowflake Unified District
682 School Bus LN.
Snowflake, AZ 85937

Round Valley Unified District
P.O. Box 610
Springerville, AZ 85938

Vernon Elementary District
P.O. Box 89
Vernon, AZ 85940

Whiteriver Unified District
P.O. Box 190
Whiteriver, AZ 85941

Flagstaff Unified District
3285 E. Sparrow
Flagstaff, AZ 86004

Maine Consolidated School District
P.O. Box 50010
Parks, AZ 86018

Colorado City Unified District
P.O. Box 309
Colorado City, AZ 86021

Fredonia-Moccasin Unified District
P.O. Box 214
Fredonia, AZ 86022

Grand Canyon Unified District
P.O. Box 519
Grand Canyon, AZ 86023

Holbrook Unified District
P.O. Box 640
Holbrook, AZ 86025

Joseph City Unified District
P.O. Box 8
Joseph City, AZ 86032

Kayenta Unified District
P.O. Box 337
Kayenta, AZ 86033

Cedar Unified District
P.O. Box 367
Keams Canyon, AZ 86034

Page Unified District
P.O. Box 1927
Page, AZ 86040

Tuba City Unified District
P.O. Box 67
Tuba City, AZ 86045

Williams Unified District
P.O. Box 427
Williams, AZ 86046

Winslow Unified District
P.O. Box 580
Winslow, AZ 86047

Prescott Unified District
146 S. Granite St
Prescott, AZ 86303

Williams Valley Elementary School District
7295 N. Bridle Path
Prescott, AZ 86305

Humboldt Unified District
8766 E. Hwy 69
Prescott Valley, AZ 86314

Bagdad Unified District
P.O. Box 427
Bagdad, AZ 86321

Hillside Elementary District
HC 01 Box 3056
Bagdad, AZ 86321

Camp Verde Unified District
410 Camp Lincoln
Camp Verde, AZ 86322

Chino Valley Unified District
P.O. Box 225
Chino Valley, AZ 86323

Clarkdale-Jerome Elementary District
P.O. Box 248
Clarkdale, AZ 86324

Mingus Union High School District
1801 E. First
Cottonwood, AZ 86326

Cottonwood - Oak Creek Elementary
District
One North Willard St
Cottonwood, AZ 86326

Kirkland Elementary District
P.O. Box 120
Kirkland, AZ 86332

Walnut Grove Elementary District
P.O. Box 912
Kirkland, AZ 86332

Mayer Unified School District
P.O. Box 1059
Mayer, AZ 86333

Beaver Creek Elementary District
4810 E. Beaver Creek Rd
Rimrock, AZ 86335

Sedona-Oak Creek Usd #9
221 Brewer Rd., Suite 100
Sedona, AZ 86336

Seligman Unified District
P.O. Box 650
Seligman, AZ 86337

Skull Valley Elementary District
P.O. Box 127
Skull Valley, AZ 86338

Crown King Elementary District
P.O. Box 188
Crown King, AZ 86343

Hackberry School District
HC 30 Box 300
Kingman, AZ 86401

Kingman Unified School District
3033 MacDonald Ave
Kingman, AZ 86401

Lake Havasu Unified District
2200 Havasupai Blvd
Lake Havasu City, AZ 86403

Littlefield Unified District
P.O. Box 730
Beaver Dam, AZ 86432

Peach Springs Unified District
P.O. Box 360
Peach Springs, AZ 86434

Valentine Elementary District
HC 35 Box 50
Peach Springs, AZ 86535

Topock Elementary District
P.O. Box 370
Topock, AZ 86436

Yucca Elementary District
P.O. Box 128
Yucca, AZ 86438

Colorado River Union High School District
P.O. Box 21479
Bullhead City, AZ 86439

Bullhead City School District
1004 Hancock Rd
Bullhead City, AZ 86442

Mohave Valley Elementary District
P.O. Box 5070
Mohave Valley, AZ 86446

Chinle Unified District
P.O. Box 587
Chinle, AZ 86503

Window Rock Unified District
P.O. Box 559
Fort Defiance, AZ 86504

Ganado Unified School District
P.O. Box 1757
Ganado, AZ 86505

Pinon Unified District
P.O. Box 839
Pinon, AZ 86510

Sanders Unified District
P.O. Box 250
Sanders, AZ 86512

Red Mesa Unified District
HC 61 Box 40
Teec Nos Pos, AZ 86514

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